

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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KALAMATA CAPITAL GROUP LLC,

Plaintiff,

Docket No.: 24-BK-03387-PB

- against -

VARALUZ LLC dba VARULZ CASS; LAFORGE  
DESIGN CORP; VARALUZ LLC; VARALUZLLC;  
VARALUZ LIGHTING; VARALUZ and RONALD  
HENDERSON,

Defendants

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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion dated July 17, 2024, the Accompanying Declaration of Ariel Bouskila dated July 17, 2024 and the attached exhibits, Plaintiff, Kalamata Capital Group LLC, will move this Court before the Honorable Philip Bentley at the United States Courthouse, One Bowling Green, New York, New York 10004, on a date and time to be determined by the Court for an order pursuant to 28 USC 1447 to remand this action to the Rockland County Supreme Court or in the alternative pursuant to 28 USC 1446 transferring this action to the Southern District for the State of New York White Plains Division and for such other relief as this court deems just and proper.

PLEASE TAKE FURTHER NOTICE that oral argument is not requested and, if the court determines to hold oral argument such will be on a date and at a time to be designated by the Court.

Dated: July 17, 2024

**BERKOVITCH & BOUSKILA PLLC**

*Counsel for Plaintiff*

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